

# **EXHIBIT G**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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DONGGUAN CHENG ONE CO., LTD.,

Civil Action No.

Plaintiff,

1:24-cv-03388

-against-

ANSWER

DESEN INC.,

Defendant.

-----X  
Defendant, **DESEN INC.**, by its attorneys, **THE KASEN AND LIU LAW FIRM, PLLC**, as and  
for an ANSWER to the COMPLAINT of plaintiff, alleges as follows.

1. Defendant, **DESEN INC.**, admits the factual allegations, conclusions of law, and claims for relief which may be discerned in **paragraph 3**, only as to it being a corporation organized under the laws of the state of New York.
2. Defendant, **DESEN INC.** admits the factual allegations which may be discerned in **paragraphs 4, 8, and 10**.
3. Defendant, **DESEN INC.**, admits the factual allegations, conclusions of law, and claims for relief which may be discerned in **paragraph 9**, only as to having made payment in the amount of **\$1,127,957.00**.
4. Defendant, **DESEN INC.**, lacks sufficient information and knowledge to respond to any factual allegations, conclusions of law, and claims for relief which may be discerned in **paragraphs 1, 2, 7, 12, and 13**.
5. Defendant, **DESEN INC.**, denies the factual allegations, conclusions of law, and claims for relief which may be discerned in **paragraph 3**, as to its principal place of business.
6. Defendant, **DESEN INC.**, denies the factual allegations, conclusions of law, and claims for relief which may be discerned in **paragraphs 9**, as to the remainder of the allegations,

other than the payment attributed to defendant, **DESEN, INC.**, in the amount of **\$1,127,957.00**.

7. Defendant, **DESEN INC.**, denies the factual allegations, conclusions of law, and claims for relief which may be discerned in **paragraphs 5, 6, 11, 14, 15, and 16**.
8. Defendant, **DESEN INC.**, reiterates and incorporates by reference its responses to **paragraphs 1-16** in response to **paragraph 17**.
9. The content of **paragraph 18** is a conclusion of law, which does not require a response.
10. Defendant, **DESEN INC.**, denies the factual allegations, conclusions of law, and claims for relief which may be discerned in **paragraphs 19, 20, and 21**.
11. Defendant, **DESEN INC.**, reiterates and incorporates by reference its responses to **paragraphs 1-21** in response to **paragraph 22**.
12. Defendant, **DESEN INC.**, denies the factual allegations, conclusions of law, and claims for relief which may be discerned in **paragraphs 23-27**.
13. Defendant, **DESEN INC.**, reiterates and incorporates by reference its responses to **paragraphs 1-27** in response to **paragraph 28**.
14. Defendant, **DESEN INC.**, admits the factual allegations in **paragraph 29**.
15. Defendant, **DESEN INC.**, denies the factual allegations, conclusions of law, and claims for relief which may be discerned in **paragraphs 30-38**.
16. Defendant, **DESEN INC.** objects to plaintiff's demand for a jury trial.

**IN RESPONSE TO THE WHEREFORE PARAGRAPH**

17. Defendant, **DESEN INC.**, denies the factual allegations, conclusions of law, and claims for relief which may be discerned in the **“wherefore” paragraph**.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

18. The plaintiff did not ship the goods at issue in a timely fashion, pursuant to the course of dealing between plaintiff and defendant, therefore, causing loss and damages to defendant, **DESEN, INC.**

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

19. Therefore, defendant, **DESEN, INC.**, did not breach any contractual obligations with plaintiff.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

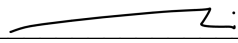
20. Venue in this matter should lie in the Eastern District of New York because the principle place of business of defendant, **DESEN, INC.**, is located in the county of Queens, state of New York.

**CONCLUSION**

**WHEREFORE**, the defendant, **DESEN, INC.**, respectfully requests that this Court enter a judgment dismissing all the causes of action set forth in and relief requested in the **COMPLAINT**; and awarding to defendant, **DESEN, INC.**, judgment on its costs, disbursements and attorneys' fees; and such other and further relief as this Court deems just, proper, and equitable.

Dated: Flushing, New York  
May 12, 2025

Yours, etc.

  
**THE KASEN AND LIU LAW FIRM PLLC**  
***Attorneys for the Defendant***  
By: Aleksander B. Milch, Esq.  
136-33 37<sup>th</sup> Avenue, #9C  
Flushing, New York 11355  
Tel. 718-337-8012  
Fax. 718-709-8850  
Email: aleksander@kasenlawfirm.com

**To:**

**MAZZOLA LINDSTROM LLP**

***Attorneys for Plaintiff***

1350 Avenue of the Americas, 2d Floor

New York, New York 10019

Tel. 646-416-6280

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**ANSWER**

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THE KASEN AND LIU LAW FIRM, PLLC

*Attorneys for Defendant,*

136-33 37<sup>th</sup> Avenue, #9C

Flushing, New York 11354

Tel: (718) 337-8012 Fax: (718) 709-8850

**To:**

MAZZOLA LINDSTROM LLP

*Attorneys for Plaintiff*

1350 Avenue of the Americas, 2d Floor

New York, New York 10019

Tel. 646-416-6280